

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: KEURIG GREEN MOUNTAIN
SINGLE-SERVE COFFEE ANTITRUST
LITIGATION

This Document Relates To:

Indirect Purchaser Actions

MDL No. 2542

Master Docket No. 1:14-md-02542-VSB

Civil Action No. 1:14-03790-VSB

**INDIRECT PURCHASER PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR
ATTORNEYS' FEES, LITIGATION EXPENSES AND SERVICE AWARDS**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, on June 4, 2021 at 10:00 a.m., in the Courtroom of the Honorable Vernon S. Broderick, United States District Court, Southern District of New York, Indirect Purchaser Plaintiffs (“IPPs”) will and hereby do move the Court for an order approving and awarding attorneys’ fees, litigation expenses, and service awards. By this motion, IPPs seek:

1. \$10,333,333.33 in attorneys’ fees;
2. \$2,298,015.93 in litigation expenses;
3. \$911,286.43 in settlement notice and administration costs payable to JND Legal Administration; and
4. Service awards of \$3,000 for each of the eleven Class Representative Plaintiffs who had their depositions taken, and \$1,500 for the remaining twenty Class Representative Plaintiffs (a total of \$63,000).

This motion is made on the grounds that: (1) such fees are fair and reasonable in light of the efforts of plaintiffs’ counsel in obtaining the settlement herein; (2) the requested attorneys’ fees comport with the applicable law; (3) the expenses for which reimbursement is sought were reasonably and necessarily incurred in connection with the prosecution of this action; and (4) a reasonable payment to plaintiffs for their efforts on behalf of the Class is warranted and appropriate. This motion is based upon this Notice of Motion, the accompanying Memorandum of Points and Authorities, the accompanying declarations of counsel in support of IPPs Motion for Final Approval of Settlement and Motion for Attorneys’ Fees, Litigation Expenses, and Service Awards, the Declaration of Gina Intrepido-Bowden Regarding Notice Plan and Settlement Administration, the pleadings and records on file herein, and upon such additional evidence or argument as may be accepted by the Court at or prior to the hearing.

DATED: May 7, 2021

By: /s/ Daniel L. Warshaw
Clifford H. Pearson (*Pro Hac Vice*)
cpearson@pswlaw.com
Daniel L. Warshaw (*Pro Hac Vice*)
dwarshaw@pswlaw.com
Matthew A. Pearson (*Pro Hac Vice*)
mapearson@pswlaw.com
PEARSON, SIMON & WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, CA 91403
Tel: (818) 788-8300
Fax: (818) 788-8104

Robert Kaplan
rkaplan@kaplanfox.com
Hae Sung Nam
hnam@kaplanfox.com
Jason A. Uris
juris@kaplanfox.com
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue
New York, NY 10022
Tel: (212) 687-1980
Fax: (212) 687-7114

Thomas H. Burt
burt@whafh.com
Mark Rifkin
rifkin@whafh.com
Patrick Donovan
donovan@whafh.com
**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**
270 Madison Avenue
New York, NY 10016
Tel: (212) 545-4600
Fax: (212) 646-0114

*Attorneys for Indirect Purchaser Plaintiffs and
Settlement Class Counsel for the Proposed
Indirect Purchaser Plaintiffs Class*